Remarks

Claims 1–3, 5-27, and 29-42 are now pending. In this Office Action, Claims 1–3, 5-27, and 29-42 are rejected under 35 USC 103(a) as being unpatentable over Kuwahara (US Pat. No.: 6,202,072) in view of Am et al PCT Application Publication No.: WO 94/14122. The cited references are respectively referred to hereinafter as Kuwahara and Am. Reconsideration of Claims 1–3, 5-27, and 29-42 are respectfully requested in view of the foregoing aments and the following remarks.

PATENTABILITY OF CLAIMED INVENTION

Independent claims 1, 15, 25, and 39 have been amended to further distinguish from the cited references. In particular, the amended Claim 1 recites:

> receiving a definition file including document type definitions (DTD) to generate a tree structure of hierarchical relationships of document elements;
> displaying an output presentation along with <u>the DTD and the tree structure simultaneously</u>, the output presentation including a number of displayable objects and respective decoration attributes about each of the displayable objects, <u>the DTD showing structures of the document elements and the tree structure showing the hierarchical relationships of the document elements based on a root element selected among the document elements</u>;
> associating at least one of the document elements in the tree structure with one of the displayable objects; and
> creating the structured document from the output presentation in accordance with the at least one of the document elements being associated with the one of the displayable objects.

(*emphasis added*)

The features are originally supported between lines 25 of page 18 to line 5 of page 19 and FIG. 3B in the Specification. In particular, when a DTD (Pool) 328 is loaded in FIG. 3B, a (XML) tree structure 330 is generated or derived from the DTD 328 and subsequently shows the hierarchical relationships of the document elements. The Applicant wishes to point out that the tree structure 330 is generated based on a root element. In other words, the tree structure 330 is formed with reference to a root element ("receipt" is used as the root element in FIG. 3) and it is the tree structure that

is used to facilitate the association of the displayable objections with the document elements. To do so, an output presentation is displayed along with <u>the DTD and the tree structure simultaneously.</u>

In contrast, Kuwahara receives a DTD but fails to teach or suggest to generate a tree structure from the DTD. Agreed by the Examiner, Kuwahara does not teach the display of the DTD. Arn is cited to show that a DTD is displayed. In Fig. 2 of Arn, a DTD is displayed in the left panel 19 and the content is displayed in the right panel 20. However, Arn does not teach or suggest that a tree structure is generated or derived from the DTD and displayed at the same time with the DTD, which can be readily appreciated in view of FIG. 3B of the pending application versus Fig. 2 of Arn. As described above, the display of the tree structure is important as it is used to facilitate the association of the displayable objections with the document elements.

The Applicant submits neither Kuwahara nor Arn, viewed alone or in combination have taught or suggested the combined features in the amended Claim 1. Accordingly, it is believed that Claims 1-3 and 5-14 shall be allowable over the cited references.

Claim 15 is also amended to further distinguish from the cited references. In particular, it recites "the second display displaying a definition file including document type definitions (DTD) <u>and a tree structure showing hierarchical relationships among document elements, the tree structure derived from the DTD and based on a root element selected among the document elements</u>", which means both a DTD and a three structure are displayed. Further it recites relevant actions take place with the tree structure (not the DTD) by "associating each of the group objects with the identifier in one of the document elements <u>of the tree structure</u>; and creating the structured document from the output presentation in accordance with the at least one of the document elements <u>of the tree structure</u> being associated with the one of the displayable objects". (*emphasis added*) Together with the other features in the claim, it is submitted neither Kuwahara nor Arn, viewed alone or in combination, have taught or suggested the combined features in the amended Claim 15. Accordingly, it is believed that Claims 15-24 shall be allowable over the cited references.

Independent Claims 25 and 39 are computer program product claims, mirroring the preceding method claims. The Examiner rejects the Claims 25 and 39 and the corresponding dependent claims 26 – 27, 29- 38 and 40 - 42 using the similar reasons. Hence, the Applicant respectfully requests that the Examiner reconsider the amended Claims 25 and 39 and their respective corresponding dependent claims in view of the remarks presented in the foregoing.

SUMMARY

The pending claims have been amended to further distinguish from the cited references. In particular, some of the unique features include 1) a tree structure is generated from a DTD, 2) the tree structure is based on a root element selected among other elements, 3) both DTD and the tree structure are displayed, and 4) it is the tree structure (not the DTD) that facilitates the association of the displayable in the output presentation with the document elements. The combined features are evidently not taught nor suggested in Kuwahara nor in Am, viewed alone or in combination. The Applicant believes that Claims 1–3, 5-27, and 29-42 shall be in condition for allowance. Early and favorable action is being respectfully solicited.
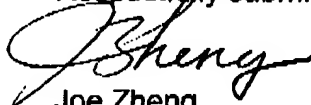
If there are any issues remaining which the Examiner believes could be resolved through either a Supplementary Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at (408)777-8873.

I hereby certify that this correspondence is being faxed to the attention of Mr. Examiner William L. Bashore at (703)746-7239,

on _2/18_, 200?.

Signed: _____

Respectfully submitted;

Joe Zheng
Reg. No.: 39,450